

## REMARKS

The examiner has objected to the title as not being descriptive. Applicants have amended the title in accordance with the examiner's request.

Claims 1-13 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Tsuchitani et al. in view of Liang et al. Applicants respectfully traverse the rejection.

The examiner states that Tsuchitani et al. discloses all of the essential features of the claimed invention except for the provision of pads that are pulled up to a power supply being located inside a semiconductor chip, wherein the pads are electrically connected to a power supply terminal outside the semiconductor chip. The examiner then relies on Liang et al. as disclosing this feature. It is the opinion of the examiner that it would be obvious to apply the teaching of Liang et al. to the structure of Tsuchitani et al.

Applicants note the examiner has failed to specifically point out where Liang et al. "[t]eaches a MOSFET chip wherein electrode (pads) that have been pulled up to a power supply inside a semiconductor chip and a power supply electrode (pad) are electrically connected to a power supply terminal outside said semiconductor chip" (Office Action, Page 3). Further, the examiner has failed to show where the references themselves would suggest combining any teaching of Liang et al. with Tsuchitani et al. The fact that references may be in the same general field of endeavor does not necessarily mean the teachings of the references would be legally obvious to combine, when neither of the references themselves is directed to the problem being addressed and solved by the claimed invention nor suggests the combination proposed by the examiner. It is the duty of the examiner to establish a prima facie case of obviousness. In this case, the examiner has failed to meet this burden.

In fact, the present invention is directed to improving the resistance of a physical quantity sensor to extraneous noise. Applicants note that in the present invention, the electrical potential of

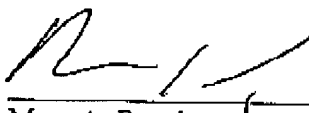
the trimming pads is fixed after the programming of the EPROM instead of allowing these pads to remain free floating. Claim 1, for example, specifically claims digital input/output pads that have undergone digital trimming in order to obtain a predetermined output. Accordingly, by connecting the trimming pads to either the external power supply or external ground, the sensitivity of the device to extraneous electrical noise is reduced. None of the references of record is directed to the problem solved by the present invention nor do the references, taken alone or singly, suggest the solution to the problem disclosed by the applicant. Thus, the combination of references, even if proper, cannot yield the claimed invention.

Applicants respectfully request reconsideration and withdrawal of the rejection of the claims. In the event that the examiner maintains the rejection, applicants submit that the examiner should provide a detailed explanation of which elements of the references of record correspond the elements being claims, and where in the references is the motivation to combine the teachings of the references as proposed by the examiner. Absent such a showing, the rejection should be withdrawn.

Respectfully submitted,

09/02/09  
Date

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